

Amendment under 37 C.F.R. § 1.111
U.S. Application No.: 10/028,913

REMARKS

Upon entry of this amendment, claims 1-10 are all the claims pending in the application. By this amendment, Applicant amends claims 1, 2, 4, 9 and 10. The amendments to claims 4 and 10 were made for reasons of precision of language and consistency, and do not narrow the literal scope of the claims and thus do not implicate an estoppel in the application of the doctrine of equivalents. The amendments to claims 4 and 10 were not made for reasons of patentability.

Preliminary Matters

Applicant thanks the Examiner for initialing the references listed on form PTO-1449 submitted with the Information Disclosure Statement filed on December 28, 2001.

The Examiner failed to acknowledge the claim for priority under 35 U.S.C. §119(e), as well as the receipt of a certified copy of the priority document filed on December 28, 2001. Therefore, it is appropriate and necessary for the Examiner to check the appropriate boxes on the Form PTO-326 indicating that the claim for priority is acknowledged and that the certified copy of the priority document has been received.

Claim Rejections under 35 U.S.C. § 102(b)

The Examiner rejected claims 1-10 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,918,012 to Astiz et al. (hereinafter “Astiz”). Applicant respectfully traverses this rejection and respectfully requests the Examiner to reconsider in view of the following remarks. As claims 1, 2, 4 and 9 are independent, the other rejected claims being dependent, this response focuses initially on claims 1, 2, 4 and 9.

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Independent claim 1 recites a unique combination of elements not found in the cited reference. For example, claim 1, as now amended, recites means for judging the presence or absence of a link destination based on point time information and point coordinate information, which is transmitted separately from the point time information.

For example, an illustrative, non-limiting embodiment of the present invention discloses an image recognizer 004, which recognizes the image based on the point coordinate information transmitted from the user terminal and based on the static image detected by the image detector. In particular, the point time information of this illustrative embodiment is transmitted separately to the image detector 003, which detects a static image of a moving image at the time a user has clicked the moving image displayed on the screen of the user terminal.

The static image from the image detector 003 and the point coordinate information from the user are then transmitted to this image recognizer 004, thereby reducing the volume of information that needs to be stored. This illustrative, non-limiting embodiment of the present invention makes it unnecessary to store link information on all point times and link information on all point coordinates.

Applicant respectfully submits that the unique combination of claim 1 including at least the claimed feature of transmitting time point information and coordinate information separately is absent from the Astiz reference. The Examiner asserts that Astiz's (x,y,t) data is equivalent to point time information and coordinate information as set forth in claim 1 (see pages 2-3 of the Office Action). Applicant has carefully studied Astiz's discussion of the (x,y,t) data and

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Applicant respectfully submits that it is different from the point time information and point coordinate information as set forth in claim 1 at least in a way it is submitted.

Astiz teaches that in a moving video, transmitting just x and y coordinates of the click are insufficient, thereby the (x, y, t) coordinates are transmitted. In particular, the t coordinate is most easily obtained by recording the frame number. However, (x, y, t) data is sent by the viewer to the browser together (col. 7, lines 37 to 38) and then, is transmitted to the server, again together (col. 8, lines 6 to 13). Astiz's (x, y, t) data is transmitted together because this coordinate data (x, y, t) is used together to look up an URL address associated with user selection on the map 35. In other words, Astiz teaches finding the associated URL address by looking up the (x, y, t) coordinates in a map script.

In short, in Astiz, (x, y, t) coordinates is a set of data, which is transmitted together and used for the same purpose. Astiz fails to teach or suggest transmitting t coordinate separately from x and y coordinate. In fact, separate transmission would make little sense for Astiz's system because all three coordinates are to be used together for looking up a map script.

Therefore, Astiz fails to teach or suggest at least transmitting point time information separately from point coordinate information as set forth in claim 1. For at least these reasons, Applicant respectfully submits that independent claim 1 is patentably distinguishable from Astiz. Applicant therefore respectfully requests the Examiner to reconsider and withdraw this rejection of independent claim 1.

Next, independent claim 2, as amended, among many unique features not taught by Astiz, recites: a link destination recognizer for recognizing a link destination based on point coordinate

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information transmitted from said user terminal and a detected static image, wherein said static image is detected from a point time information transmitted from said user terminal. The Examiner alleges that Astiz's map file is similar to recognizing a link based on static image and point time information (see page 3 of the Office Action). Applicant respectfully disagrees with Examiner.

Astiz teaches accessing a script file, as shown in Col. 8, lines 45 to 59. This file is a table, where the user determines associated URL address by finding user designated (x, y, t) data. The coordinate t is a frame number and x and y are points on the screen. This data is transmitted from the user browser to the server. Data (x, y, t) is not determined in the server. Astiz clearly fails to teach or suggest finding an associated URL address from a static image detected in the server. In fact, in Astiz only a map file (a table) is accessed, no static images are detected. Moreover, Astiz only uses numbers to determine the corresponding URL address. The reference fails to teach or suggest detecting a static image from a point time information (e.g. using this frame number to retrieve the corresponding image frame), and thereby, using the retrieved static image with point coordinate information to determine whether a link is present.

Therefore, Astiz fails to teach or suggest at least determining a link based on a static image and point coordinate information, wherein said static image is determined based on point time information as set forth in claim 2. For at least these reasons, Applicant respectfully submits that independent claim 2 is patentably distinguishable from Astiz. Applicant therefore respectfully requests the Examiner to reconsider and withdraw this rejection of independent claim 2 and its dependent claim 3.

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Independent claim 4 among many novel features not taught by Astiz, recites an image detector for detecting a static image and an image recognizer. Astiz fails to teach or suggest an image detector and an image recognizer as alleged by the Examiner. Astiz's system is incapable of recognizing a specific portion of the image, thereby reducing the link information content that needs to be stored. Astiz simply acquires the desired URL address from a look up table (map script file). Not only does Astiz fail to teach or suggest detecting a static image as explained herein above with reference to claim 2 but also, Astiz fails to teach or suggest recognizing a particular image.

The Examiner alleges that retrieving the map script to recognize image is equivalent to image recognition as set forth in claim 4. Applicant respectfully disagrees. The script file is used to determine, match URL address with (x, y, t) data sent from the user. This URL address is used by the browser (allegedly the user terminal, see page 2 of the Office Action) to retrieve an image. That is, in Astiz, no image recognition is performed based on static image and point coordinate. Astiz only teaches retrieving URL address by accessing map script corresponding to the (x, y, t) data sent by the browser. Astiz does not teach or suggest any image recognition.

For at least these reasons, Applicant respectfully submits that independent claim 4 is patentably distinguishable from Astiz. Applicant therefore respectfully requests the Examiner to reconsider and withdraw this rejection of independent claim 4 and its dependent claims 5-8.

Finally, claim 9 recites a number of unique features not taught by the reference cited by the Examiner. For example, claim 9 includes features similar to the features argued above with respect to claim 4. Therefore, those arguments are respectfully submitted to apply with equal

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force here. For at least substantially the same reasons, therefore, Applicant submits that claim 9 is patentably distinguishable from Astiz. Also, Applicant respectfully submits that claim 10 is allowable at least by virtue of its dependency on claim 9.

Conclusion and request for telephone interview

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to be charged to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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